

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BOMBARDIER INC.,
Plaintiff,

v.

MITSUBISHI AIRCRAFT
CORPORATION, MITSUBISHI
AIRCRAFT CORPORATION AMERICA,
INC., et al.,
Defendants.

No. 2:18-cv-1543 JLR

DECLARATION OF MARY Z. GASTON IN
SUPPORT OF DEFENDANT MITSUBISHI
AIRCRAFT CORPORATION'S MOTION
TO FILE UNDER SEAL

NOTE ON MOTION CALENDAR:

May 31, 2019

Mary Z. Gaston declares as follows:

1. I am a partner in the law firm of Perkins Coie LLP and counsel for Defendant Mitsubishi Aircraft Corporation Japan ("MITAC") in this action. Unless otherwise stated, I make this declaration based on personal knowledge of the events and matters described herein or information provided to me by MITAC.

2. In previous filings, MITAC submitted its filings to Bombardier before filing, Bombardier proposed redactions based on information it claims is confidential, and MITAC filed a redacted version to the public docket and an unredacted version under seal.

4. Thus, pursuant to Local Rule 5(g)(1)(A) and (3)(A), the parties met and conferred to reach an agreement on filing MITAC's response. This discussion took place on the telephone on May 10, 2019 and the primary participants were John Whitaker with Christensen O'Connor Johnson Kindness PLLC (on behalf of Bombardier) and Mary Gaston with Perkins Coie LLP (on behalf of MITAC America).

5. The parties agreed that MITAC would move to file its brief in opposition and supporting declarations under seal in their entirety on May 13, 2019, in compliance with the Court-ordered deadline. Bombardier would then have three days to use its best efforts to redact any information it claims is confidential and send a redacted copy to MITAC. MITAC would file a redacted copy with this Court on May 17, 2019.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 13th day of May.

s/ Mary Z. Gaston

Mary Z. Gaston

CERTIFICATE OF SERVICE

I certify under penalty of perjury that on May 13, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses indicated on the Court's Electronic Mail Notice List.

DATED this 13th day of May 2019.

s/ Mary Z. Gaston

Mary Z. Gaston, WSBA No. 27258

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